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Counsel for Canyon Farm II, LLC

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In re:

Chapter 11

EASTERDAY RANCHES, INC., et al.¹

Case No. 21-00141-WLH11

Debtor.

Adv. Pro. No. 23-80002

**STIPULATION EXTENDING
DEADLINE TO ANSWER OR
OTHERWISE RESPOND TO
COMPLAINT TO AVOID
FRAUDULENT TRANSFER**

BC-140, LLC (“Plaintiff”), by and through its undersigned counsel, and Canyon Farm, LLC (“Defendant”), by and through its undersigned counsel, hereby enter into this Stipulation

¹ The Debtors along with their case numbers are as follows: Easterday Ranches, Inc. (21-00141) and Easterday Farms, a Washington general partnership (21-00176-WLH11).

1 Extending Deadline to Answer or Otherwise Respond to Complaint to Avoid Fraudulent
2 Transfer (this “Stipulation”) as follows:

3 1. On January 31, 2023, Plaintiff filed its Complaint to Avoid Fraudulent Transfer
4 [Docket No. 1] (the “Complaint”), thereby commencing the above-captioned adversary
5 proceeding.

6 2. The deadline to answer or otherwise respond to the Complaint was March 3, 2023
7 (the “Initial Answer Deadline”). On March 3, 2023, Plaintiff and Defendant filed their
8 Stipulation Extending Deadline to Answer or Otherwise Respond to Complaint to Avoid
9 Fraudulent Transfer [Docket No. 6] (the “Stipulation”). Pursuant to the Stipulation, the deadline
10 to answer or otherwise respond to the Complaint is April 3, 2023 (the “Second Answer
11 Deadline”).

12 3. On April 3, 2023, Defendant filed its Motion for Order Extending Deadline to
13 Answer or Otherwise Respond to Complaint to Avoid Fraudulent Transfer [Docket No. 8] (the
14 “Extension Motion”). The Extension Motion was granted by Order of the Court [Docket No. 10]
15 and the Second Answer Deadline was extended to May 3, 2023 (the “Deadline”) and the
16 scheduling conference was reset to May 17, 2023 at 2:00 p.m. (the “Scheduling Conference”).

17 4. On May 3, 2023, Plaintiff and Defendant filed their Stipulation Extending
18 Deadline to Answer or Otherwise Respond to Complaint to Avoid Fraudulent Transfer [Docket
19 No. 12] extending the Deadline to May 15, 2023. On May 4, 2023, the Court removed the
20 Scheduling Conference from the calendar.

21 5. On May 15, 2023, Plaintiff and Defendant filed their Stipulation Extending
22 Deadline to Answer or Otherwise Respond to Complaint to Avoid Fraudulent Transfer [Docket
23 No. 15] extending the Deadline to May 22, 2023.

24 6. On May 22, 2023, Plaintiff and Defendant filed their Stipulation Extending
25 Deadline to Answer or Otherwise Respond to Complaint to Avoid Fraudulent Transfer [Docket
26 No. 16] extending the Deadline to May 30, 2023.

1 7. On May 30, 2023, Plaintiff and Defendant filed their Stipulation Extending
2 Deadline to Answer or Otherwise Respond to Complaint to Avoid Fraudulent Transfer [Docket
3 No. 17] extending the Deadline to June 6, 2023.

4 8. Plaintiff and Defendant have continued to engage in settlement discussions. Thus,
5 Plaintiff and Defendant hereby stipulate to extend the Deadline up to and including June 27,
6 2023.

7
8 Dated: June 6, 2023

Dated: June 6, 2023

9 TONKON TORP LLP

GORDON REES SCULLY MANSUKHANI,
10 LLP

11 By: /s/ Timothy J. Conway
12 Timothy J. Conway, WSBA No. 52204
Ava L. Schoen, admitted Pro Hac Vice
13 Attorneys for Plaintiff

14 By: /s/ Megan M. Adeyemo
15 W. Gregory Lockwood, WSBA No. 52232
Jeffrey D. Cawdrey, admitted Pro Hac Vice
16 Megan M. Adeyemo, admitted Pro Hac Vice
17 Attorneys for Defendant

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on June 6, 2023 a true and correct copy of the foregoing was e-filed
3 with the Clerk of the Court by using the CM/ECF system, which effectuated service upon all
4 counsel of record.

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6 _____
7 */s/ Anita Soto*
for Gordon Rees Scully Mansukhani, LLP

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